

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN STOCK TRANSFER & TRUST
COMPANY, LLC, as Trustee,

Plaintiff,

- against -

SANOFL,

Defendant.

Civil Action No.: 1:15-cv-08725 (GBD)

Oral Argument Requested

**NOTICE OF PLAINTIFF'S MOTION FOR
LEAVE TO FILE SUPPLEMENTAL COMPLAINT AND A SPEEDY HEARING
PURSUANT TO FRCP 57**

PLEASE TAKE NOTICE THAT upon the accompanying Memorandum of Law and accompanying exhibits, Plaintiff American Stock Transfer & Trust Company, LLC, as Trustee will, and hereby does, move this Court, before the Honorable George B. Daniels, United States District Judge, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and at a time to be set by the Court, for an order granting leave to file a supplemental complaint pursuant to Rule 15(d) of the Federal Rules of Civil Procedure, for a speedy hearing pursuant to Rule 57 of the Federal Rules of Civil Procedure and for such other and further relief as the Court may deem just and proper.

Dated: May 26, 2016
New York, New York

Respectfully submitted,

/s/ Stacey J. Rappaport
MILBANK, TWEED, HADLEY & McCLOY LLP
Stacey J. Rappaport
Rachel Penski Fissell
Mario Lucero
28 Liberty Street
New York, NY 10005
Telephone: 212-530-5000

Andrew M. Leblanc
1850 K Street, NW, Suite 1100
Washington, DC 20006
Telephone: 202-835-7500

*Attorneys for Plaintiff American Stock Transfer &
Trust Company, LLC, as Trustee*

TO:

John A. Neuwirth
Joshua S. Amsel
Stefania D. Venezia
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
(212) 310-8000

Attorneys for Defendant Sanofi